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and Travis Flaherty*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah

**DEFENDANTS IX GLOBAL, LLC,
JOSEPH A. MARTINEZ, AND
TRAVIS FLAHERTY’S UNOPPOSED
MOTION TO EXTEND TIME TO
REPLY TO PLAINTIFF’S
OPPOSITION TO DEFENDANTS’
MOTION TO DISMISS**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER. DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to DUCivR 7-1(a)(2)(A) and (G), Defendants iX Global, LLC, Joseph A. Martinez, and Travis Flaherty (“iX Global Defendants”), through counsel of record, hereby move the Court to extend the date by which they must Reply to Plaintiff’s Opposition to Defendants’ Motion to Dismiss. Due to the length of Plaintiff’s Opposition and the upcoming Thanksgiving holiday, iX Global Defendants request an additional week to Reply to Plaintiff’s Opposition. Additionally, counsel for iX Global Defendants has met and conferred with Co-Defendants listed in the Court’s September 15, 2023, Minute Entry [Dkt. No. 147] as “Defendants not represented by Morrison Cohen LLP” and counsel for Co-Defendants have agreed that a week-long extension would be appropriate for all such Co-Defendants. Therefore, iX Global Defendants also request

the reply deadline for the Co-Defendants listed in the Court's September 15, 2023, Minute Entry also be extended so that all such replies would be due on December 4, 2023. Counsel for Plaintiff has consented to the extension request.

Based on the foregoing, iX Global Defendants respectfully request the deadline to Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss be moved from September 27, 2023 to December 4, 2023.

Dated: November 21, 2023

POLSINELLI PC

/s/ Jose A. Abarca

Romaine C. Marshall

Jose A. Abarca

Jonathan E. Schmalfeld

*Attorneys for Defendants iX Global, LLC,
Joseph A. Martinez, Flaherty Enterprises,
LLC, and Travis Flaherty*

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of November 2023, the foregoing document was served
via CM/ECF to all counsel of record.

/s/ Kaitlin Morgan